REMARKS

In the Office Action mailed on December 14, 2005, the Examiner: rejected claims 1-20 under 35 U.S.C. § 112, first paragraph; rejected claims 1-20 under 35 U.S.C. § 112, second paragraph; rejected claims 1-8 under 35 U.S.C. § 101; rejected claims 1-4, 6-11 and 13-17 under 35 U.S.C. § 102(e) over U.S. Patent No. 6,633,914 to Bayeh et al. ("Bayeh"); rejected claims 5 and 12 under 35 U.S.C. § 103(a) over Bayeh in view of MICHAEL J. HERNANDEZ, DATABASE DESIGN FOR MERE MORTALS, Chapter 11 (Addison-Wesley, 1997) ("Hernandez"); and rejected claims 18-20 under 35 U.S.C. § 103(a) over Bayeh in view of admitted prior art. Applicants herein cancel claims 1-20, and present new claims 21-33. As a result, claims 21-33 are now pending. Further examination and review in view of the amendments and remarks below are respectfully requested.

Applicants' techniques are directed to a client server system having an object manager interposed between thin clients on client computer systems and business objects on server computer systems. The business objects contain the business logic for applications, and are contained within the object manager. The object manager provides common control and monitoring of the business objects. When the thin clients send requests to the server to access the business objects (i.e., the applications), the object manager handles the requests to access the business object by maintaining a status of each thin client making the request in a corresponding object manager thread.

I.   Rejections under 35 U.S.C. § 112, first paragraph

The Examiner rejected claims 1-20 under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. In particular, the Examiner stated that the "specification in general is more of a sales brochure" and that terms such as "business objects and components," "run-time engine," and "business rules" are "either described in vague generalities or in terms of each other, or in terms of technologies not disclosed or known to a skilled artisan."

Although Applicants herein cancel claims 1-20, Applicants respectfully submit that the terms "business objects and components," "run-time engine," and "business rules" are described in the specification in a manner to enable any person skilled in the art to make and use the claimed invention. By way of example, page 5, line 16-page 6, line 7 of the specification clearly describes business objects as horizontal or function specific applications, vertical or industry specific applications, or Internet applications. Moreover, Figures 7, 7a, and 7b, and the corresponding discussion at page 22, line 7-page 37, line 20 of the specification, further illustrate and describe the business objects and the business components as being a part of the object manager. Page 3, lines 19-20 of the specification describes the run-time engine as an object manager run-time engine that operates on the business objects and business components. Page 22, line 28-page 23, line 16 of the specification further details the functionality of the run-time engine. Page 10, lines 1-4 of the specification states that the business rules, in the form of business objects, are highly configurable software representations of business concepts.

II.   Rejections under 35 U.S.C. § 112, second paragraph

The Examiner rejected claims 1-20 under 35 U.S.C. § 112, second paragraph. In particular, the Examiner stated that the term "thin client" in claim 1 is a relative term which renders the claim indefinite. Applicants respectfully traverse this rejection. Page 11, line 13-page 20, line 20 of the specification clearly defines thin clients as applications in which the main tiers of the application are separated from each other, and additionally provides details of a thin client for WINDOWS (TCW) and a JAVA thin client (JTC). Therefore, Applicants respectfully request that this rejection be withdrawn.

The Examiner also indicated that there is insufficient antecedent basis for the term "said application server" in independent claims 1, 9, and 15. Without conceding the propriety of the rejection of these claims, Applicants herein cancel these claims, thereby obviating this rejection.

The Examiner also indicated that the term "business objects and business components" in claims 3 and 4 is considered to be indefinite. Applicants respectfully traverse this rejection. As discussed above, Applicants respectfully submit that business objects are clearly defined in the specification. Therefore, Applicants respectfully request that this rejection be withdrawn.

The Examiner further indicated that claim 5 recites the term "business rules" which is not described. Although Applicants herein cancel claim 5, obviating this rejection without conceding the propriety of the rejection of this claim, Applicants respectfully submit that business rules are clearly defined in the specification, as discussed above.

III.   Rejections under 35 U.S.C. § 101

The Examiner rejected claims 1-8 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Without conceding the propriety of the rejection of these claims, Applicants herein cancel these claims, thereby obviating this rejection.

IV.   Rejections under 35 U.S.C. §§ 102 and 103

Claims 1-20 stand rejected over Bayeh, either alone or in combination with Hernandez or admitted prior art. Bayeh merely describes using a web server as an intermediary between a requesting client and a server application. (col. 1, lines 52-53.) When a client issues a request, the web server allocates a server thread to process the client request. The server thread processes the client request by passing the request to the appropriate server application via an HTTP daemon, and waits for the server application to process the client request. (col. 1, lines 53-62.)

Newly added claims 21-33 recite an object manager that (1) contains business objects, (2) provides common control and monitoring of the business objects, and (3) handles requests to access the business objects from multiple thin clients by maintaining a status of each thin client in a corresponding object manager thread. Although Bayeh discloses a web server that allocates a server thread to process a client request for a

server application, the server thread is only used to dispatch the client request to the appropriate server application. (col. 1, lines 42-62). Bayeh contains no suggestion of the web server providing common control and monitoring of the server applications, nor does Bayeh contain any suggestion of the web server maintaining a status of a client in a server thread. Additionally, Hernandez neither teaches nor suggests an object manager that provides common control and monitoring of the contained business objects, nor does Hernandez teach or suggest maintaining a status of each client making a request in a corresponding object manager thread. Applicants respectfully submit that claims 21-33 are unarguably patentable over the combination of Bayeh and Hernandez.

V.   Conclusion

In view of the foregoing, Applicants respectfully submit that claims 21-33 are allowable and ask that this application be passed to allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8000.

Dated: _____

Respectfully submitted,

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